REMARKS

The application has been reviewed in light of the Office Action dated July 13, 2004. Claims 1-20 are pending in this application, with claims 1, 8 and 15 being in independent form. By the present Amendment, claims 1 and 11 have been amended to correct formal matters. It is submitted that no new matter has been added and no new issues have been raised by the present Amendment.

Claim 11 was objected to for containing the following informalities "...said application program is execution" in line 2. Claim 11 has therefore been amended to correct these informalities.

Claims 1-20 were rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the enablement requirement. Specifically, claims 1, 8 and 15, as previously amended, recite "the first output data type not being dependent on the first input data type" (lines 9-10). "the one data type having an input attribute not being dependent on the another data types having an output attribute" (lines 7-9), and "wherein the another data type having an output attribute is not dependent on the one data type having an input attribute" (lines 15-16). The Office Action asserts that this language seems contradictory because the claims "teach the conversion of a first input data type(s) into an output data type(s) using conversion routine(s)." However, independent claims 1 (as amended), 8 and 15 claim converting *data* of an input data type to an output data type. While data that has been converted to an output data type may be dependent on the same data in the input data type, the independent claims claim that the output data *type* is not dependant on the input data *type*.

Independent claim 1 has been amended to clarify this distinction. The Applicants believe that independent claims 8 and 15 already clarify this position. In addition to this position being supported by independent claims 8 and 15, the paragraph of the original disclosure beginning on page 2, line 13 reads "One embodiment of the present invention is a system for converting *data* from input field types to output field types" (emphasis added).

Therefore, in view of the amendments to the claims, and the above reasoning, it is respectfully requested that the rejection under Section 112, first paragraph, be reconsidered and withdrawn.

Claims 1-6, 8-12 and 15-19 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Allen et al. (United States Patent Number 6,502,236) (Allen). Applicants have

carefully considered the Examiner's comments and the cited art, and respectfully submit independent claims 1, 8 and 15 are patentably distinct from the cited art, for at least the following reasons.

Independent claim 1 relates to a method of converting data of a plurality of input data types to a plurality of output data types by an application program. The method comprises receiving a first attribute of a first input data type and a second attribute of a first output data type, dynamically creating at runtime a first optimized conversion routine based on the first attribute and the second attribute (the conversion routine including one or more computer instructions to be executed during conversion) and executing the first optimized conversion routine from the application program to convert data of the first input data type to the first output data type, the first output data type not being dependent on the first input data type.

Allen, as understood by the Applicants, relates to a system for automatic program generation which receives a number of input *format descriptors* and a number of output *format descriptors*. The system generates a program for converting an input data sequence having a format described by input format descriptors to an output data sequence having a format described by the output format descriptors.

Allen, as understood by the Applicants, requires the use of *format descriptors* to generate the program for converting the input data sequence to the output data sequence. According to Allen (col. 3, line 66 – col. 4, line 8):

> Each layer of a communications protocol stack is represented by 0 or more format descriptors, and the descriptors within the input format descriptor series and the output format descriptor series are guaranteed to be ordered in the same order as the layers of the protocol stacks.
>
> The input format descriptor series 32 describes the format of the input data stream 40, while the output format descriptor series 34 describes the format of the output data stream 42.

Accordingly, as understood by Applicants, Allen uses format descriptors to dynamically create, at runtime, a first optimized conversion routine. In contrast, independent claim 1 of the present disclosure utilizes one or more attributes from the input and output data types.

Moreover, independent claim 1 recites that the first output data type is not dependent on the first input data type. Allen does not appear to teach or suggest this feature.

Accordingly, Applicants submit independent claim 1 is patentably distinct from the cited art. Independent claims 8 and 15 are believed to be patentably distinct for at least similar reasons.

Moreover, independent claims 8 and 15 recite receiving input attributes and output attributes from an application program. Allen does not appear to teach or suggest receiving attributes from an application program.

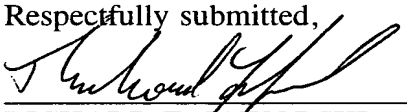
The Office is hereby authorized to charge any additional fees that may be required in connection with this amendment and to credit any overpayment to our Deposit Account No. 03-3125.

If a petition for an extension of time is required to make this response timely, this paper should be considered to be such a petition, and the Commissioner is authorized to charge the requisite fees to our Deposit Account No. 03-3125.

If a telephone interview could advance the prosecution of this application, the Examiner is respectfully requested to call the undersigned attorney.

Entry of this amendment and allowance of this application are respectfully requested.

Respectfully submitted,



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